UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- x

UNITED STATES OF AMERICA	:	**SUPERSEDING INDICTMENT**
- v. -	:	S1 17 Cr. 421 (GHW)
ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani,"	:	
Defendant.	:	

- x

COUNT ONE

(Attempted Provision of Material Support and Resources to ISIS)

The Grand Jury charges:

1. From at least in or about January 2017, up to and including in or about June 2017, in the Southern District of New York and elsewhere, ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, did knowingly and intentionally attempt to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel and services, to a foreign terrorist organization, namely, the Islamic State of Iraq and al-Sham ("ISIS"), which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the Immigration and Nationality Act ("INA"), and is currently designated as such as of the date of the filing

of this Superseding Indictment, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), to wit, RAISHANI, a resident of the Bronx, New York, attempted to travel from the United States to Syria, via Turkey, to join ISIS.

(Title 18, United States Code, Sections 2339B and 2.)

COUNT TWO

(Conspiracy to Provide Material Support and Resources to ISIS)

The Grand Jury further charges:

2. From at least in or about September 2015, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, together with others known and unknown, did knowingly and intentionally conspire to provide "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel, to a foreign terrorist organization, namely, ISIS, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to

Section 219 of the INA, and is currently designated as such as of the date of the filing of this Superseding Indictment.

3. It was a part and an object of the conspiracy that ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, and others known and unknown, would and did knowingly and intentionally provide, and attempt to provide, ISIS with "material support or resources," including personnel, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989).

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 30, 2015, ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, arranged for the transportation of a co-conspirator not named as a defendant herein ("CC-1") from the Bronx, New York to John F. Kennedy

International Airport in Queens, New York ("JFK Airport"), and accompanied CC-1 from the Bronx to JFK Airport.

b. On or about October 30, 2015, CC-1 departed from JFK Airport for Istanbul, Turkey.

c. On or about January 2, 2016, RAISHANI sent an email to CC-1 stating, in substance and in part: "Glad tidings brother. Its been some time since your voyage. I pray to Allah The ALL MIGHTY to grant you success. Until next time."

d. On or about April 1, 2016, RAISHANI sent an email to CC-1 stating, in substance and in part: "I hope Allah has bestowed you what you were seeking. . . . May Allah grant you sincere and clean intentions and make you among the righteous in Janatal Firdaus [a reference to Islamic paradise]. . . . Please return this email and respond to what we agreed upon before your departure. Until next time."

e. On or about May 3, 2016, CC-1 sent an email to RAISHANI stating, in substance and in part, that CC-1 was "fine and well," that CC-1 "wished you [RAISHANI] were here with me," and that "here we are living with izza [honor]."

f. On or about May 3, 2016, CC-1 sent messages on a particular social media application ("Application-1") to another user stating, in substance and in part: "I'm living in the Islamic state safely and secure by the permission of Allah," "[h]ere we are fighting the kuffars [non-believers]," and "I

left the land of kuffars now I'm living in the khilafah [caliphate]."

g. On or about May 4, 2016, CC-1 posted a photograph on Application-1 that shows CC-1 carrying an assault rifle and a flag representative of ISIS.

(Title 18, United States Code, Section 2339B.)

COUNT THREE

(Provision of Material Support and Resources to ISIS)

The Grand Jury further charges:

5. From at least in or about September 2015, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, and others known and unknown, did knowingly and intentionally provide, and attempt to provide, "material support or resources," as that term is defined in Title 18, United States Code, Section 2339A(b), including personnel, to a foreign terrorist organization, namely, ISIS, which at all relevant times has been designated by the Secretary of State as a foreign terrorist organization, pursuant to Section 219 of the INA, and is currently designated as such as of the date of the filing of this Superseding Indictment, knowing that ISIS was a designated foreign terrorist organization (as defined in Title 18, United States Code, Section 2339B(g)(6)), that ISIS engages and has engaged in

terrorist activity (as defined in Section 212(a)(3)(B) of the INA), and that ISIS engages and has engaged in terrorism (as defined in section 140(d)(2) of the Foreign Relations Authorization Act, Fiscal Years 1988 and 1989), to wit, RAISHANI assisted CC-1 to travel overseas and join ISIS.

(Title 18, United States Code, Section 2339B and 2.)

FORFEITURE ALLEGATIONS

6. As a result of planning and perpetrating Federal crimes of terrorism against the United States, as defined in Title 18, United States Code, Section 2332b(g)(5), as alleged in Counts One, Two, and Three of this Superseding Indictment, ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), any and all assets, foreign and domestic, of the defendant; any and all assets, foreign and domestic, affording the defendant a source of influence over any entity or organization engaged in planning or perpetrating said offenses; any and all assets, foreign and domestic, acquired or maintained with the intent and for the purpose of supporting, planning, conducting or concealing said offenses; any and all assets, foreign and domestic, derived from, involved in, or used or intended to be used to commit said offenses, including but not

limited to a sum of money in United States currency representing the total amount of the defendant's assets.

Substitute Assets Provision

7. If any of the above-described forfeitable property, as a result of any act or omission of ADAM RAISHANI, a/k/a "Saddam Mohamed Raishani," the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)

FOREPERSON

JOON H. KIM
Acting United States Attorney

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SUPERSEDING INDICTMENT

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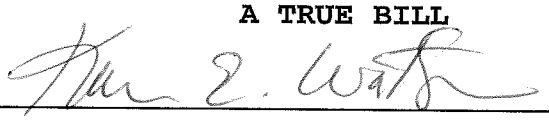
(18 U.S.C. §§ 2339B and 2.))

JOON H. KIM
Acting United States Attorney.

A TRUE BILL



Foreperson